

# SAUL EWING

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August 12, 2024

**VIA ECF**

The Honorable Denise L. Cote  
United States District Court for the Southern District of New York  
500 Pearl Street, Room 1910  
New York, NY 10007

Re: *Interstate Management Company, LLC v. 510 W42 Hotel Operating, LLC*  
Request to Adjourn Initial Pre-Trial Conference  
Case No. 1:24-cv-04336-DLC

Dear Judge Cote:

This firm represents Plaintiff Interstate Management Company, LLC ("Plaintiff" or "Interstate") in the above-referenced action against Defendant 510 W42 Hotel Operating, LLC ("Defendant").

In accordance with the guidelines set forth in the Court's Notice of Initial Pre-Trial Conference, we respectfully submit this letter request for an adjournment of the September 6, 2024 Initial Pre-Trial Conference. Regretfully, I am unavailable on September 6, 2024. I will be traveling to attend my sister-in-law's wedding. I have conferred with counsel for Defendant, Joseph Taylor, Esq., and he has graciously consented to this request to adjourn the Initial Pre-Trial Conference.

In conferring with Mr. Taylor, and in accordance with paragraph 5(c) of the Court's Notice of Initial Pre-Trial Conference, we have determined that the next subsequent Friday on which we are both available is Friday, October 4, 2024.<sup>1</sup> As such, we respectfully request that the conference be adjourned Friday, October 4, 2024.

*The conference is rescheduled to Sept. 12 at 10<sup>30</sup> am.*  
*Shane S. Simon 8/14/24*

<sup>1</sup> Mr. Taylor is unavailable on Friday, September 13, 2024. I am unavailable on Friday, September 20, 2024 as I will be on a pre-paid vacation. I am similarly unavailable on Friday, September 27, 2024 as I am attending a pre-paid legal conference in Washington, D.C.

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We sincerely apologize for any inconvenience this adjournment request may cause and appreciate the Court's consideration of this matter. Thank you.

Respectfully submitted,

*Shane P. Simon*

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cc: All Counsel of Record (via ECF)